

## Remarks

### Status of the Claims

Claims 1-26 were pending in the application and stand rejected. By this paper, claims 1, 3, 9, 14, 22 and 23 have been amended, and claims 2, 15, 21 and 24 have been canceled without prejudice or disclaimer. For the reasons set forth below, Applicant submits that each of the pending claims is patentably distinct from the cited prior art and in condition for allowance. Reconsideration of the claims is therefore respectfully requested.

### Claim Objections

Claim 24 stands rejected based on insufficient antecedent basis for the limitation "said consistent data format." Claim 24 has been canceled herein without prejudice or disclaimer, mooting this objection.

### Claim Rejections – 35 U.S.C. § 102

Claims 1-26 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,690,391 issued to Proehl et al. ("Proehl"). As discussed in detail below, this rejection is respectfully traversed because Proehl does not teach or suggest each of the limitations in the independent claims, as amended and presented herein. See M.P.E.P. § 2131 (stating that in order to anticipate a claim, a prior art reference must identically teach every element of the claim).

#### 1. Proehl does not teach or suggest converting data from incompatible databases to a common format via function calls that are independent of the databases.

An aspect of the pending claims is that a graphical user interface ("GUI") for a multimedia system may display incompatible data from disparate databases by using the same set of function calls regardless of the particular database being accessed. Thus, as different media formats are developed and used over time, the system may add, delete, or modify multimedia databases without the need to upgrade an entire system.

As discussed in Applicant's previous response, Proehl's system accesses data in a variety of disparate databases, such as local CD track lists, a television programming (EPG) database, and music download databases. Those and other databases are illustrated by reference numbers 42a ... 42m and 49a ... 49i in Proehl's Figure 3 and described at column 7, lines 21-36. However, ***Proehl does not describe how his various applications or routines interface with those databases.*** Instead, Proehl describes the overall functionality of his system and GUI without disclosing any particular software architecture. Notably, the only passages of Proehl's specification mentioning his databases are column 7, lines 21-36 (cited above) and a passing mention at column 13, lines 56-58.

Page 2 of the present Office Action asserts that "the claim does not [require] the [in-depth] of 'how the various applications or routines interface with those databases.'" Applicant respectfully disagrees and maintains that the claims as previously pending are patentably distinguished over Proehl. The independent claims have been amended, however, in order to clarify the features of Applicant's inventions.

Applicant respectfully submits that Proehl is completely silent as to "a plurality of nodes to retrieve data from one or more of said databases and to convert said data to a common format displayable by said GUI in response to a predetermined ***set of function calls that are independent of said databases,***" as required, among other things, in amended claim 1 (emphasis added). Further, Proehl does not teach or suggest "wherein said data is converted and provided to said GUI from both said first data interface object and said second data interface object via an ***application programming interface (API) comprising a predetermined set of function calls that are independent of said different entertainment media databases,***" as recited, among other things in, in amended claim 14 (emphasis added). A similar limitation is found in independent claim 23.

2. Proehl does not teach or suggest a node manager that links a requested node's services to the requested node such that the services are displayable by the GUI in response to the predetermined set of function calls.

Another aspect of certain pending claims is that services associated with various nodes are separate from the corresponding nodes such that individual services may be

added, modified or removed without affecting the entire system. Thus, for example, a new service may be linked to a group of nodes and may subsequently be displayed by the GUI using the same set of function calls used to access the corresponding node.

Applicant respectfully submits that Proehl does not teach or suggest “a node manager to return an indication of a requested node of said plurality of nodes to said GUI and to link said requested node’s respective one or more services to said requested node such that said respective services are displayable by said GUI in response to said predetermined set of function calls,” as recited, among other things, in amended claim 1.

### Conclusion

For at least the foregoing reasons, the cited prior art references, whether considered individually or in combination, fail to disclose each of the limitations in any of the pending independent claims. For at least the same reasons, each of the claims depending therefrom are also patentably distinct from the cited prior art.

In view of the foregoing, all pending claims represent patentable subject matter. A Notice of Allowance is respectfully requested.

Respectfully submitted,  
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